

Kevin M. McDonough
LATHAM & WATKINS LLP
1271 Avenue of the Americas
New York, NY 10020
Tel.: (212) 906-1200
Email: kevin.mcdonough@lw.com
Attorneys for Defendants
PeopleConnect, Inc., PeopleConnect
Holdings, Inc., Intelius LLC, and
PeopleConnect Intermediate, LLC

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY
CORPORATION, *as assignee of*
individuals who are Covered Persons,
JANE DOE-1, *a law enforcement*
officer, JANE DOE-2, *a law*
enforcement officer, EDWIN
MALDONADO, SCOTT MALONEY,
JUSTYNA MALONEY, PATRICK
COLLIGAN, and WILLIAM
SULLIVAN,

Plaintiffs,

v.

PEOPLECONNECT, INC.,
PEOPLECONNECT HOLDINGS,
INC., INTELIUS, LLC,
PEOPLECONNECT
INTERMEDIATE, LLC, RICHARD
ROES 1-10, *fictitious names of*
unknown individuals
and ABC COMPANIES 1-10, *fictitious*
names of unknown entities,

Defendants.

CASE NO. 3:24-cv-4227-MAS-TJB

District Judge Michael A. Shipp

Magistrate Judge Tonianne J.
Bongiovanni

APPLICATION FOR CLERK’S ORDER EXTENDING TIME
PURSUANT TO LOCAL RULE 6.1(B)

Application is hereby made for a Clerk’s Order, pursuant to L. Civ. R. 6.1(b), extending by 14 days the time within which defendants PeopleConnect, Inc., PeopleConnect Holdings Inc., Intelius, LLC, and PeopleConnect Intermediate LLC (collectively “Defendants”) may answer, move, or otherwise respond to the Complaint filed by Plaintiffs herein. It is represented that:

1. Defendants removed this action to this Court on March 26, 2024.
2. Pursuant to Fed. R. Civ. P. 81(c)(2) the time to answer, move, or otherwise respond to the Complaint expires on April 2, 2024.
3. Defendants have not previously sought from this Court an extension of time to answer, move, or otherwise respond to the Complaint.
4. Defendants respectfully request, pursuant to L. Civ. R. 6.1(b), a 14-day extension of time within which to answer, move, or otherwise respond to the Complaint, i.e., until April 16, 2024.

Dated: April 1, 2024

/s/ Kevin M. McDonough
Kevin M. McDonough (ID:
41892005)
Serrin Turner (*pro hac vice*
forthcoming)
LATHAM & WATKINS LLP
1271 Avenue of Americas
New York, NY 10020
Telephone: (212) 906-1200
Email: kevin.mcdonough@lw.com
serrin.turner@lw.com

Robert Collins (*pro hac vice
forthcoming*)
LATHAM & WATKINS LLP
330 N. Wabash Ave.
Chicago, IL 60611
Telephone: (312) 876-7700
Email: robert.collins@lw.com

Jennifer Archie (*pro hac vie
forthcoming*)
LATHAM & WATKINS LLP
555 Eleventh Street, NW, Suite 1000
Washington, D.C. 20004
Telephone: (202)-637-2205
Email: jennifer.archie@lw.com

Craig Carpenito (ID: 027102000)
KING & SPAULDING LLP
1185 Avenue of the Americas
New York, NY 10036
Telephone: (212)-556-2142
Email: ccarpenito@kslaw.com

Thomas P. Scrivo (ID: 029101989)
James DiGiulio (ID: 013582006)
O'TOOLE SCRIVO, LLC
14 Village Park Road
Cedar Grove, NJ 07009
Telephone: (973) 239-5700
Email: tscrivo@oslaw.com
jdigiulio@oslaw.com

*Attorneys for Defendants
PeopleConnect, Inc., PeopleConnect
Holdings, Inc., Intelius LLC, and
PeopleConnect Intermediate, LLC*

[PROPOSED] ORDER

The application is GRANTED; the time within which Defendants PeopleConnect, Inc., PeopleConnect Holdings, Inc., Intelius LLC, and PeopleConnect Intermediate, LLC are required to answer, move, or otherwise reply is extended to April 16, 2024.

Dated: April 1, 2024

By: _____

CERTIFICATE OF SERVICE

I hereby certify that on April 1, 2024, I electronically filed the foregoing by using the Court's CM/ECF system, and accordingly served all parties who receive notice of the filing via the Court's CM/ECF system.

/s/ Kevin M. McDonough

Kevin M. McDonough